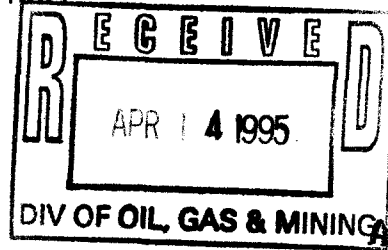




United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District
Price River Resource Area
900 North 700 East
Price, Utah 84501



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(UT-066)

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Mr. Randolph B. Gainer
Environmental Manager
Genwal Coal Company
P. O. Box 1420
Huntington, Utah 84528

ACT/015/032 #2 Copy [signature] ad [signature]

Re: Resource Recovery and Protection Plan (R2P2), Revision for Longwall Mining, Crandall Mine

Dear Mr. Gainer:

The Bureau of Land Management (BLM) received a copy of the subject mine plan revision on February 13, 1995, which includes changes to the R2P2. We have reviewed this change with respect to the approved R2P2 and the governing regulations (43 CFR 3482.1 (b)), and have determined that deficiencies exist. The items below need to be addressed:

1. The mine map (Plate #5-2) shows planned longwall panels and blocks for longwall development entries. As per 43 CFR 3482.2(c)(4)(v)(D), a sketch is needed of a typical entry system for panel development showing centerline distances. Also, in order to make a maximum economic recovery (MER) determination, the BLM will need the basis for the gate entry pillar design.
2. Two areas on the mine map (Plate #5-2) that were previously planned to be mined show no mining. These are (1) the block of coal between the last west longwall panel of section 35 and 26, T. 15 S., R. 6 E., and the west boundary and (2) the triangular block of coal in the SW 1/4 of section 25, same township and range. As per 43 CFR 3482.2(c)(7), justification shall be submitted to the BLM for all portions of a coalbed that are not mined or rendered unminable.
3. In section 5.22 of the revised mining plan (bottom of page 5-7 and top of page 5-7), a statement is made that, on development, coal may not be cut higher than 8 feet. Genwal generalizes a safety concern for rib sluffage. Rib sluffage may occur, but for BLM to make a blanket approval of no development mining greater than 8 feet, documentation of this blanket condition needs to be supplied. Genwal makes mention that width to height ratios of 5.6 and less result in excess slabs of coal breaking from the rib into the entries. The BLM finds that the width to height ratio

is more applicable to successful yielding gate road pillar design and not general rib stability (see enclosed Bureau of Mines study). Before BLM can give approval to all development mining to a 8-foot maximum, Genwal must show that rib sluffage occurs throughout the mine and is due only to the height of the entry being greater than 8 feet.

4. In order to make a MER determination, the criteria and basis for the size of solid coal barriers left to protect main entries and panels need to be supplied (page 5-8).
5. On page 5-12, a revised equipment list is provided. In order for the BLM to make a MER determination, the manufacturer's specifications of the equipment and any other factors that would limit the cutting height of the coal, need to be provided.
6. In changing from room-and-pillar panels to longwall panels, the BLM expects that if an area is found not to be amenable to longwall mining because of unforeseen conditions, other mining methods will be used, such as first mining with continuous mining machines, unless conditions preclude all other mining methods. A commitment by Genwal needs to be stated that if an area that is approved for longwall mining cannot be mined with that method, proper justification, including detailed economics, needs to be provided before reserves can be deleted from any other mining methods. In assessing MER of a block of coal, BLM must take into consideration a number of factors. A copy of a MER checklist is enclosed.

Before an approval for the R2P2 revision can be recommended to Utah Division of Oil, Gas and Mining, these items need to be addressed. If you have any questions, please feel free to contact George Tetreault or Stephen Falk of my staff at 637-4584.

Sincerely,

MARK E. BAILEY

Area Manager

2 Enclosures

1. Bureau of Mines Report
2. MER Checklist

cc: UT-921, Utah State Office (wo/encl.)
Utah Division of Oil, Gas and Mining (wo/encl.)
355 West North Temple Street
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203